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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

<b>UNITED STATES OF AMERICA,</b>	)	CR No. 09- <i>28-HA</i>
	)	
v.	)	
	)	<b><u>INDICTMENT</u></b>
	)	
<b>VADIM S. PISKUNOV,</b>	)	<b>18 U.S.C. § 1343</b>
	)	<b>(Wire fraud)</b>
<b>Defendant.</b>	)	<b>18 U.S.C. § 1341</b>
	)	<b>(Mail fraud)</b>
	)	<b>18 U.S.C. § 1028A</b>
	)	<b>(Aggravated identity theft)</b>

**THE GRAND JURY CHARGES:**

**I. INTRODUCTION AND OVERVIEW TO ALL COUNTS**

1. Beginning in or about September 2007, and continuing through March 2008, within the District of Oregon and elsewhere, defendant VADIM S. PISKUNOV knowingly and intentionally devised and intended to devise, and participated in, a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises (Scheme to Defraud).

2. It was part of the Scheme to Defraud that:

- (a) PISKUNOV, using his true identity, established a shell company in Oregon named U.S. Appliance Repair and Service ("U.S. Appliance");
- (b) PISKUNOV established bank accounts for U.S. Appliance at U.S. Bank and Wells Fargo Bank, again using his true identity;
- (c) PISKUNOV then applied for and received merchant credit card processing accounts for U.S. Appliance from RBSLynk and Bank of America, using the stolen or

fraudulently obtained identity of J.A., an individual known to the grand jury;

(d) PISKUNOV submitted or caused to be submitted fraudulent credit card charges from U.S. Appliance to RBSLynk and Bank of America, causing RBSLynk and Bank of America to deposit money in the charged amounts to the U.S. Appliance bank accounts;

(e) PISKUNOV caused those amounts to be withdrawn from the U.S. Appliance bank accounts before the fraud was detected; and

(f) PISKUNOV would use interstate wire communications and commercial interstate carriers to carry out the scheme.

**COUNTS 1-2**  
**(Wire Fraud, 18 U.S.C. § 1343)**

3. Paragraphs 1 and 2 are re-alleged and incorporated herein.

4. On or about the dates listed below, within the District of Oregon and elsewhere, defendant VADIM S. PISKUNOV, for the purpose of executing the Scheme to Defraud and attempting to do so, did knowingly transmit and cause to be transmitted in interstate commerce by means of wire communication, writings, signs, signals, and pictures, to the recipients and at the locations shown below, each interstate wire communication being a separate count of the Indictment:

<u>Count</u>	<u>Date (on or about)</u>	<u>Wire</u>	<u>Origin</u>	<u>Destination</u>	<u>Use of Communication</u>	<u>Recipient Company</u>
1	12/12/07	Fax	Portland, OR	Atlanta, GA	Application for credit card merchant account on behalf of U.S. Appliance, using stolen or fraudulently obtained identity of J.A.	RBSLynk
2	12/12/07	Fax	Portland, OR	Louisville, KY	Application for credit card merchant account on behalf of U.S. Appliance, using stolen or fraudulently obtained identity of J.A.	Bank of America

all in violation of Title 18, United States Code, Section 1343.

**COUNTS 3-4**  
**(Mail Fraud, 18 U.S.C. § 1341)**

5. Paragraphs 1 and 2 are re-alleged and incorporated herein.

6. On or about the dates listed below, within the District of Oregon and elsewhere, defendant VADIM S. PISKUNOV, for the purpose of executing the Scheme to Defraud and artifice and attempting to do so, did knowingly cause to be delivered by Federal Express, a commercial interstate carrier, credit card processing machines and other related equipment to the recipients and at the locations shown below, each use of such interstate carrier being a separate count of the Indictment:

<u>Count</u>	<u>Date</u> <u>(on or about)</u>	<u>From</u>	<u>To</u>	<u>Carrier</u>
3	12/13/07	RBSLynk (Louisville, KY)	US Appliance Repair & Service (Portland, OR)	FEDEX
4	12/18/07	TASQ Technology, on behalf of Bank of America (Roseville, CA)	US Appliance Repair & Service (Portland, OR)	FEDEX

all in violation of Title 18, United States Code, Section 1341.

**COUNT 5**  
**(Aggravated Identity Theft, 18 U.S.C. § 1028A)**

7. Counts 1-4 are re-alleged and incorporated herein.

8. On or about December 12, 2007, in the District of Oregon and elsewhere, defendant VADIM S. PISKUNOV, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to felony violations of mail fraud and wire fraud under Title 18, United States Code, Sections 1341 and 1343, as alleged in Counts 1-4, to wit: by knowingly transferring, possessing, and using, without lawful authority, the name, social security number, and date of birth of J.A., an individual known to the grand jury, to apply for merchant credit card processing accounts from RBSLynk and Bank of America on behalf of U.S. Appliance, all in violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATIONS**

9. Upon conviction of one or more of the offenses alleged in Counts 1 through 4 of this Indictment, defendant VADIM S. PISKUNOV shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(2)), any property constituting or derived from proceeds obtained directly or

indirectly as the result of violations of 8 U.S.C. § 1341 and 8 U.S.C. § 1343, including but not limited to:

- \$7,050 cash,
- the merchant credit card processing machine received from Bank of America, and
- the merchant credit card processing machine received from RBSLynk.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

DATED this 22nd day of January, 2009.

A TRUE BILL.

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OFFICIATING FOREPERSON

KARIN J. IMMERGUT  
United States Attorney  
District of Oregon

Presented by:

Stacie F. Beckerman  
STACIE F. BECKERMAN, OSB #062397  
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